

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

| | | |
|--|---|------------------------|
| In re: |) | Chapter 11 |
| |) | |
| Squirrels Research Labs LLC <i>et al.</i> , ¹ |) | Case No. 21-61491 |
| |) | (Jointly Administered) |
| Debtor. |) | |
| |) | Judge Russ Kendig |

CERTIFICATE OF SERVICE

I, Julie K Zurn, proposed counsel for Debtor, The Midwest Data Company LLC, hereby certify that on November 23, 2021 true and correct copies of the following:

1. Motion for Joint Administration of Chapter 11 Cases Pursuant to Bankruptcy Rule 1015(b);
2. Motion of Debtors for Interim and Final Orders: (I) Authorizing the Midwest Data Company LLC to Obtain Debtor in Possession Financing; (II) Modifying the Automatic Stay; (III) Approving DIP Loan and Security Agreement with Instantiation LLC; (IV) Setting Final Hearing; and (V) Granting Related Relief;
3. Motion of Debtor and Debtor-In-Possession, the Midwest Data Company LLC, For a Final Order: (A) Prohibiting Utilities From Altering, Refusing or Discontinuing Services to, or Discriminating Against, the Debtor on Account of Prepetition Invoices; (B) Determining That the Utilities are Adequately Assured of Future Payment; and (C) Establishing Procedures For Determining Requests For Additional Assurance;
4. Motion of Debtors and Debtors-In-Possession For an Order (A) Scheduling Expedited Hearing on Certain First Day Motions and (B) Approving Form and Manner of Notice Thereof;
5. Motion for an Order: (A)(I) Establishing and Approving Bid Procedures Related to the Sale of Certain of the Debtors' Assets Pursuant to 11 U.S.C. § 105(A), Including the Designation of Stalking Horse Bidder and Related Bid Protections; (II) Approving Contract/Lease Assumption and Assignment Procedures and the Form and Notice Thereof; (III) Scheduling the Auction; (IV) Scheduling a Hearing and Objection Deadline with Respect to the Sale; (V) Approving the

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Squirrels Research Labs LLC (9310), case no. 21-61491 and The Midwest Data Company LLC (1213), case no. 21-61492.

Form and Notice Thereof; and (VI) Granting Related Relief; and (B)(I) Authorizing Sale of Debtors' Assets Free and Clear of Liens, Claims, Encumbrances, and Interests Pursuant to 11 U.S.C. §§ 105 and 363; and (II) Approving Assumption and Assignment of Executory Contracts and Unexpired Leases; and (C) Granting Related Relief;

6. Motion to Shorten Time to Respond to, and Expedite the Hearing on the Motion for an Order: (A)(I) Establishing and Approving Bid Procedures Related to the Sale of Certain of the Debtors' Assets Pursuant to 11 U.S.C. § 105(A), Including the Designation of Stalking Horse Bidder and Related Bid Protections; (II) Approving Contract/Lease Assumption and Assignment Procedures and the Form and Notice Thereof; (III) Scheduling the Auction; (IV) Scheduling a Hearing and Objection Deadline with Respect to the Sale; (V) Approving the Form and Notice Thereof; and (VI) Granting Related Relief; and (B)(I) Authorizing Sale of Debtors' Assets Free and Clear of Liens, Claims, Encumbrances, and Interests Pursuant to 11 U.S.C. §§ 105 and 363; and (II) Approving Assumption and Assignment of Executory Contracts and Unexpired Leases; and (C) Granting Related Relief; and

7. Declaration of David Stanfill in Support of First Day Filings

were served by Federal Express Priority Overnight mail, on the following:

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Dated: December 2, 2021

Respectfully submitted,

/s/ Julie K. Zurn

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*Proposed Counsel for the Debtor
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